

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**JANELL SALGADO, Administrator of the
Estate of VICTOR ANGEL FLORES,
deceased,**

Plaintiff,

v.

**JOHN, JAMES and MARY DOE, individually
and as agents/employees of CITY OF CHICAGO,
and CITY OF CHICAGO, a municipal
corporation;**

Defendants,

**Case No. 08 cv 2878
Judge Gottschall
Magistrate Judge Mason**

PLAINTIFF'S RULE 26(A)(1) INITIAL DISCLOSURES

Plaintiff, pursuant to Federal Rule of Civil Procedure 26(a)(1), submits its initial disclosures in this matter:

(i) The following persons are likely to have, or know of, discoverable information in this case:

1. **Janell Salgado** (1212 50th Avenue, Cicero, IL). She is decedent's mother. She knows about decedent's medical condition, including mental health conditions. She knows decedent made a suicide threat prior to the date of this incident. She was present when Chicago Police Department arrested decedent on or about June 27/28, 2007, and told Chicago Police Officers about decedent's mental health condition and told these officers decedent was suicidal. She also witnessed Chicago Police Department's treatment of decedent on or about June 27/28, 2007. She went to medical examiner's office to identify decedent on June 28, 2007.

2. **Angela Salgado** (1212 50th Avenue, Cicero, IL). She is Janell Salgado's sister and decedent's aunt. She knows about decedent's medical condition, including mental health conditions. She knows decedent made a suicide threat prior to the date of this incident.

3. **Victor Flores** (3229 S. Komensky). He is decedent's father. He knows about decedent's medical condition, including mental health conditions. He knows decedent made a suicide threat prior to the date of this incident. He went to medical examiner's office to identify decedent on June 28, 2007.

4. **Melissa Flores** (1212 50th Avenue, Cicero, IL). She is decedent's sister. She knows about decedent's medical condition, including mental health conditions. She knows decedent made a suicide threat prior to the date of this incident. She was present when Chicago Police Department arrested decedent on or about June 27/28, 2007. She knows that, at that time, Chicago Police Officers were told about decedent's mental health condition and were told that decedent was suicidal. She also witnessed Chicago Police Department's treatment of decedent on or about June 27/28, 2007.

5. **Celannes Rivera** (1212 50th Avenue, Cicero, IL). She is decedent's sister. She knows about decedent's medical condition, including mental health conditions. She knows decedent made a suicide threat prior to the date of this incident. She was present when Chicago Police Department arrested decedent on or about June 27/28, 2007. She knows that, at that time, Chicago Police Officers were told about decedent's mental health condition and were told that decedent was suicidal. She also knows about conversations between Chicago Police Department and Chicago Fire Department. She also witnessed Chicago Police Department's treatment of decedent on or about June 27/28, 2007.

6. **Jose Saze** (1212 50th Avenue, Cicero, IL). He is a cousin of decedent. He knows about decedent's medical condition, including mental health conditions. He knows decedent made a suicide threat prior to the date of this incident. He was present when Chicago Police Department arrested decedent on or about June 27/28, 2007. He knows that, at that time, Chicago Police Officers were told about decedent's mental health condition and were told that decedent was suicidal. He also witnessed Chicago Police Department's treatment of decedent on or about June 27/28, 2007.

7. **Carolina Tenorio** (1833 South 51st Street, Cicero, IL 60804). She is the mother of one of decedent's two children. She knows about decedent's medical condition, including mental health conditions. She was present when Chicago Police Department arrested decedent on or about June 27/28, 2007. She knows that, at that time, Chicago Police Officers were told about decedent's mental health condition and were told that decedent was suicidal. She also knows about conversations between Chicago Police Department and Chicago Fire Department. She also witnessed Chicago Police Department's treatment of decedent on or about June 27/28, 2007.

8. **Abigal Ruiz** (3231 S. Karlov, Chicago, IL 60623). She is the mother of one of decedent's two children. She knows about decedent's medical condition, including mental health conditions.

(ii) Plaintiff has the following documents relevant to this matter:

1. Death Certificate for Victor Angel Flores
2. Medical Examiner's Report of Victor Angel Flores

Plaintiff has subpoenaed, but not received, records from Cicero Police Department and from Cook County State's Attorney's Office.

s/Bryan J. O'Connor Jr.
Respectfully submitted,
Bryan J. O'Connor Jr.
Attorney for Plaintiff

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